



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
McNichols Scrap Iron and Metal Company

**FROM:** Valeria Apolinario, Environmental Engineer  
AECAB (MN/OH)

**THRU:** Brian Dickens, Section Supervisor  
AECAB (MN/OH)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** McNichols Scrap Iron and Metal Co.

**Facility Location:** 6500 E. McNichols Road, Detroit, MI 48212

**Date of Inspection:** August 9, 2022

**U.S. EPA Inspector(s):**

1. Valeria Apolinario, Environmental Engineer
2. Daniel Schaufelberger, Environmental Scientist

**Other Attendees:**

1. Alon Grinwald, Office Manager
2. Robert Kost, Yard Manager
3. Jerry Krawiec, Environmental Engineer, EGLE

**Contact Email Address:** alon@mcnicholsscrap.com

**Purpose of Inspection:** to determine compliance with the Clean Air Act regulations at 40 C.F.R. Part 82 Subpart F: Recycling and Emissions Reduction. This inspection was a part of an environmental justice initiative concentrating on the Detroit area.

**Facility Type:** Recycling Center/Scrapyard

**Regulations Central to Inspection:** 40 C.F.R. Part 82 Subpart F, including 40 C.F.R. §82.155 safe disposal of appliances, such as small appliances and motor vehicle air conditioners, and 40 C.F.R. §82.156, proper evacuation of refrigerant from appliances.

**Arrival Time:** 9:05 am  
**Departure Time:** 10:26 pm

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet – via email
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Alon Grinwald and Robert Kost unless otherwise noted.

**Process Description:**

McNichols Scrap Iron and Metal Company (McNichols) accepts ferrous and nonferrous material from the general public and commercial vendors. The facility accepts white goods, appliances, vehicle radiators, and refrigeration components. When an appliance comes into the facility, personnel inspect the appliance to verify the sealed unit, or compressor, is separated from the appliance. If the compressor is missing within the appliance, or the compressor and appliance are in two pieces, the appliance is accepted. If the sealed unit is still within the appliance, then the facility rejects the items. The facility does not recover refrigerant from appliances.

**Staff Interview:**

- There are approximately 18-20 employees at the facility.
- There are balers within the facility, but paper, not steel, is baled.
- Approximately 80% of customers are peddlers, 20% are commercial accounts.
- Upon sale of an appliance or sealed unit, the customer signs the scale purchase ticket that includes a statement that they certify that CFCs had not leaked previously, have been properly removed according to U.S. EPA guidelines, and that no further recovery is possible.
- The facility estimates that a range of 30-60 appliances could be accepted per day, with most being refrigerators.
- On September 20, U.S. EPA asked for further clarification on the facility's use of the CFC statement. U.S. EPA saw printed and signed on scale receipts. A CFC statement is printed on any purchase ticket on the sale of items that may contain CFCs, including sheet iron, sealed units, or aluminium-copper radiators.

**TOUR INFORMATION**

**U.S. EPA Tour of the Facility:** Yes

**Data Collected and Observations:**

- During the tour of the facility, U.S. EPA noted a sign at the entrance of the facility that stated that appliances containing freon would not be accepted. The sign was missing a few words and broken around the edges, as seen in Item 1 of Appendix A.
- Compressors were collected separately from appliances, as seen in Item 2 of Appendix A.
- A compressor was seen within a refrigerator within the facility's appliance pile, pictured in Items 6-8 of Appendix A. Refrigerant circuitry had been detached from the appliance.
- When asked about motor vehicle acceptances, facility personnel stated that motor vehicles often arrived in pieces. Motor vehicle radiators were accepted at the facility.

**Photos and/or Videos:** were taken during the inspection.

**Field Measurements:** were not taken during this inspection.

**CLOSING CONFERENCE**

- ☒ Provided U.S. EPA point of contact to the facility

**Requested Documents:**

- Copies of a signed CFC receipt from the past week (8/8-8/12/22), past year (2021), past 2 years (from 2020), and past 3 years (from 2019).
- An estimate of the number of small appliances (the type that use refrigerant, e.g. fridges, freezers, dehumidifiers, vending machines, etc., NOT stoves/washers/dryers/dishwashers) delivered to McNichols in the month of July 2022 (and any documentation available to support this estimate).

**Compliance Assistance:** U.S. EPA discussed strategies for not incentivizing customers to vent refrigerant. These include not accepting appliances with damaged refrigerant lines, having signs communicating refrigerant recovery requirements, and updating CFC verification statements to dictate whether the refrigerant had leaked out or was properly recovered.

**Concerns:** U.S. EPA stated to the facility that the current signage on appliance acceptances should be updated to properly communicate the same refrigerant recovery requirements as used in the CFC statement of the receipts. U.S. EPA also raised concerns on how the facility's current acceptance policy encourages for the public to cut, and thus vent refrigerant, from compressor lines to ensure the appliance would be accepted.

### **DIGITAL SIGNATURES**

Report Author: \_\_\_\_\_

Section Supervisor: \_\_\_\_\_ for Brian Dickens

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#### **APPENDICES AND ATTACHMENTS**

1. Appendix A: Digital Image Log

**Facility Name:** McNichols Scrap Iron and Metal Co.  
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**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name:</b> Valeria Apolinario	<b>2. Archival Record Location:</b> U.S. EPA Region 5 Electronic Records Center
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<b>Image Number</b>	<b>File Name</b>	<b>Date and Time (incl. Time zone and DST)</b>	<b>Description of Image</b>
1	IMG_0169.JPG	2022:08:09 09:42:13	Sign detailing restricted materials
2	IMG_0170.JPG	2022:08:09 09:43:11	Sign stating the facility does not accept appliances containing freon, missing words.
3	IMG_0171.JPG	2022:08:09 09:44:15	Main scrap pile
4	IMG_0172.JPG	2022:08:09 09:45:49	Appliance without a compressor
5	IMG_0173.JPG	2022:08:09 10:05:59	Compressor separated from appliance
6	IMG_0174.JPG	2022:08:09 10:08:59	Compressor within refrigerator at appliance pile-1
7	IMG_0175.JPG	2022:08:09 10:09:57	Compressor within refrigerator at appliance pile-2
8	IMG_0176.JPG	2022:08:09 10:10:01	Compressor within refrigerator in appliance pile-3